

KEN THERRIEN
413 NORTH SECOND STREET
YAKIMA, WA 98901
509.457.5991

Attorney for:

MORRIS BRUCE JACKSON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
(Honorable Salvador Mendoza Jr.)

UNITED STATE OF AMERICA,
Plaintiff,
vs.

MORRIS BRUCE JACKSON,
Defendant.

NO. 19-CR-2039-SMJ

DEFENDANT MOTION FOR
RELEASE FROM CUSTODY

FILED RESTRICTED

February 3, 2021 at 9:00 a.m.

Yakima, WA - With Oral Argument

COMES NOW, Ken Therrien, the attorney for Morris Bruce Jackson and moves the court for an order to release Morris Bruce Jackson from custody. Morris Jackson plead guilty to Felon in Possession of a Firearm on May 19, 2020(ECF 66) Mr. Jackson sentencing hearing is presently scheduled for March 23, 2021 at 9:00 a.m.

On January 15, 2021 (ECF 296) the Court granted Donovan Cloud's request for a continuance and set the new trial date for both Co-Defendants to February 28, 2022. As part of his agreement with the Government, Morris Jackson has agreed to testify for the Government should one or both of the "Co-defendants" proceed to trial. Morris Jackson was prepared to testify for

DEFENDANT'S MOTION TO BE RELEASED FROM
CUSTODY Page 1

KEN THERRIEN, PLLC
413 NORTH SECOND STREET
YAKIMA, WA 98901
(509) 457-5991

1 the Government if the case proceeded to trial on January 19, 2021. Since the
2 trial date has been reset to February 28, 2022, both the Government and
3 Morris Jackson agree he should be released from custody pending the new
4 trial date February 28, 2022. To facilitate this Morris Jackson has a made a
5 motion to continue his sentence hearing date to April 26, 2022 at 9:00 a.m.
6 in Yakima, Washington.
7

8 Based upon the above, the Government has agreed to release Morris
9 Jackson from custody subject to Standard Conditions of Release and GPS
10 monitoring while awaiting the trial of James and Donovan Cloud. When
11 released, Morris Jackson will stay with his father, Russell Jackson Sr, at a
12 residence located in Skamania County, WA. Counsel for Morris Jackson has
13 contacted Russell Jackson Sr., and has confirmed that Morris Jackson can
14 stay at his address.
15

16 The Declarant was advised today by USPO Phil Casey that Skamania
17 County is located in the Western District of Washington. The Declarant will
18 work with the United States Attorney Office and the United States Probation
19 Office to address this issue at the time of the hearing.
20

21 Conclusion

22 Mr. Jackson respectfully request that this court grant his motion for
23 release from custody subject to conditions that the Court deems appropriate.
24

25 //

26 //

27 //

28 //

29 //

30 DEFENDANT'S MOTION TO BE RELEASED FROM
31 CUSTODY Page 2

KEN THERRIEN, PLLC
413 NORTH SECOND STREET
YAKIMA, WA 98901
(509) 457-5991

1 Dated this 26th day of January, 2021.

2
3 /s/ Ken Therrien

4 KEN THERRIEN, WSBA #20291

5 Attorney for Morris Jackson

6 413 North Second Street

7 Yakima, WA 98901

8 (509) 457-5991

9 Fax: (509) 457-6197

10 kentherrien@msn.com

11
12 **CERTIFICATE OF SERVICE**

13
14 I hereby certify under penalty of perjury of the laws of the State of Washington that on
15 January 26, 2021, I electronically filed the foregoing with the Clerk of the Court using
16 the CM/ECF System which will send notification of such filing to the following:

- 17
- 18 • Thomas Hanlon, Assistant United States Attorney
 - 19 • Richard C. Burson, Assistant United States Attorney
 - 20 • Elijah T. Marchbanks, Attorney for Defendant

21 s/ Ken Therrien

22 KEN THERRIEN, WSBA #20291

23 Attorney for Morris Jackson

24 413 North Second Street

25 Yakima, WA 98901

26 (509) 457-5991

27 Fax: (509) 457-6197

28 kentherrien@msn.com

29
30 DEFENDANT'S MOTION TO BE RELEASED FROM
31 CUSTODY Page 3

KEN THERRIEN, PLLC

413 NORTH SECOND STREET

YAKIMA, WA 98901

(509) 457-5991